

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division

SARA JUDITH GARCIA GALDAMEZ,)
JORGE ARMANDO ESCOBAR BARILLAS,)
AND)
VIRGINIA DE JESUS PEÑA POZUELOS,)
Plaintiffs,)
v.) Civil Action No. 1:15-cv-01605
I.Q. DATA INTERNATIONAL, INC.,)
Defendant.)

MOTION TO DISMISS

COMES NOW Defendant I.Q. Data International, Inc. (“IQ Data”), by counsel, pursuant to Rule 12(b)(6) of the Federal Rules of Civil Procedure, and hereby moves the Court to dismiss the Complaint filed against it by Plaintiffs Sara Judith Garcia Galdamez, Jorge Armando Escobar Barillas, and Virginia de Jesus Peña Pozuelos (collectively, “Plaintiffs”) for failure to state a claim upon which relief can be granted. In support thereof, IQ Data incorporates by reference the accompanying Memorandum in Support filed contemporaneously herewith.

WHEREFORE IQ Data respectfully requests that this Honorable Court grant its Motion to Dismiss, dismiss Plaintiffs’ Complaint with prejudice, and grant it such other and further relief as this Court deems appropriate.

Date: February 1, 2016

Respectfully submitted,

/s/

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CERTIFICATE OF FILING AND SERVICE

I hereby certify that on the 1st Day of February, 2016, I will electronically file the foregoing with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing to the following:

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